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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of) MM Docket No. 95-23
)
Amendment of Section 73.202(b),) RM-8578
Table of Allotments,)
FM Broadcast Stations.)
(Madisonville, Texas))

TO: Chief, Allocations Branch
Policy and Rules Division

DOCKET FILE COPY ORIGINAL

**COMMENTS AND COUNTERPROPOSAL OF LEON HUNT
IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING**

Leon Hunt, d/b/a Hunt Broadcasting (herein "Hunt" or "petitioner"), by counsel, and pursuant to the Commission's Rules, hereby respectfully submits his comments and a counterproposal to the Notice of Proposed Rule Making (the Notice), DA 95-196, released February 21, 1995, corrected by Erratum, released February 28, 1995. The Notice, as requested by Hunt's December 23, 1994 Petition for Rule Making, proposed the allotment of Channel 272A to Madisonville, Texas. The Notice sought comments thereon or before April 14, 1995, and reply comments on or before May 1, 1995.

Petitioner now respectfully submits his Comments and a Counterproposal thereto requesting that the Commission substitute FM Channel 263A for proposed Channel 272A at Madisonville, Texas, which Hunt believes provides a better opportunity to provide FM service to the community of Madisonville. As good cause therefor, Hunt states as follows:

1. Petitioner's allocation statement, prepared by consulting engineer John Furr, showing that Channel 263A can be allotted to Madisonville, is attached. The statement establishes that the allotment of Channel 263A (in lieu of Channel 272A as petitioner initially proposed) would meet all separation requirements of §73.207 of the Commission's rules, and operation from a site 8.1 kilometers north of the reference coordinates of Madisonville will provide at least a 70 dBu signal over the entire city of Madisonville.

2. Since the filing of his original request for allotment of a new FM channel to Madisonville, Hunt has conducted listening tests on Channel 272A and on Channel 263A, and he has concluded that the latter will provide far better service in practical terms, to the Madisonville area. Moreover, listening tests have revealed tropospheric propagation and temperature inversions on Channel 272A that appear less pronounced on Channel 263A. Use of Channel 263A assumes increased importance in light of the relatively low power provided by Class A facilities. Too, the rural areas about Madisonville that Petitioner seeks to reach will be better served by the freedom from interference that operation on Channel 263A will apparently provide. Indeed, the public interest encourages allotment of Channel 263A to Madisonville in preference to Channel 272A.

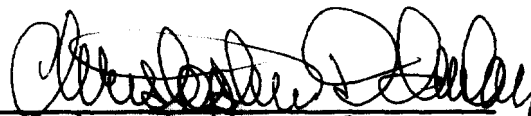
Upon allotment of a new FM channel, preferably Channel 263A, at Madisonville, petitioner will file an application therefor at

the first available opportunity to do so, and upon its grant, will construct and operate a new FM station on that channel.¹

Respectfully submitted,

**LEON HUNT, d/b/a HUNT
BROADCASTING**

By


Christopher D. Imlay
His Counsel

BOOTH, FRERET & IMLAY
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March 16, 1995

¹ Petitioner will apply for, construct and operate on whichever channel the Commission allocates.

ALLOCATION STATEMENT

This statement is prepared on behalf of KMVL in Madisonville, Texas. This is an amendment to petition for Rulemaking which requests an amendment of the Table of FM Channel Allotments, Section 73.202(b) of the FCC Rules. The request is to amend the original Channel 272-A to 263-A. This statement discusses the technical factors involved in the above change.

1. The reference coordinates for this Madisonville, Texas proposal are:

Latitude 31°00'50" North, Longitude 95°57'06" West

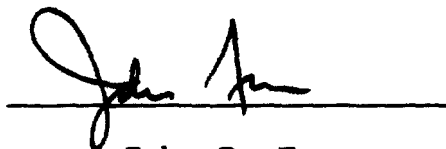
This location is 8.1 km north of the reference coordinates of Madisonville, Texas, which are 30°56'50" North, 95°54'41" West.

2. As can be seen from the attached Exhibit A, Class A operation from this site will comply with all separation requirements as set forth in §73.207 of the FCC Rules.

3. From these reference coordinates, the entire city of Madisonville will be served with the 70 dBu contour as required by §73.315(a) and (b) as shown in Exhibit B.

I, John R. Furr, am a Communications Consultant, and represent KMVL. My qualifications are a matter of record with the Federal Communications Commission, and all statements made herein are true and correct to the best of my knowledge and belief.

March 9, 1995



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JF&A
COMMUNICATIONS
CONSULTANTS

KMVL
MADISONVILLE, TX
NARRATIVE

03-08-1995

John Furr & Associates Inc.

PAGE 1

FM Study for: ALLOC

FCC Database Date: 1/95

31-00-50

Location: MADISONVILLE, TX

Channel Class: A

95-57-06

Call City, State

Chan Class Freq kW Latitude Dist.

Required

Status Proponent

File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 263 100.5 mHz <<<<<<<<

KILTFM HOUSTON, TX 262 C 100.3 95. 29-34-34 164.95 165
 LIC LEGACY BROADCASTING, BLH-831031AJ 585 95-30-36 165.0 -0.05 CLOSE

ALLOC REDLAND, TX 263 C3 100.5 31-32-53 142.21 142
 ADD FAYETTE BROADCASTING Docket-89-459 0 94-35-38 65.0 +0.21 CLOSE
 Site Restricted 19.8KM Northeast

KASE AUSTIN, TX 264 C 100.7 100. 30-19-10 193.3 165
 LIC KVET BROADCASTING COM BLH-820628AN 363 97-48-06 247.0 +28.3 CLEAR

KJMZ DALLAS, TX 262 C 100.3 89. 32-35-07 199.1 165
 LIC DKM BROADCASTING CORP BLH-5136 390 96-58-06 331.3 +34.1 CLEAR

KMIA WINNIE, TX 264 C 100.7 29-49-12 200.6 165
 ADD ROY E. HENDERSON Docket-90-90 0 94-23-00 130.9 +35.6 CLEAR
 Counterproposal

KMIA WINNIE, TX 264 C 100.7 29-49-12 200.6 165
 ADD FORT BEND BROADCASTIN Docket-89-459 0 94-23-00 130.9 +35.6 CLEAR

WACOFM WACO, TX 260 C 99.9 90.0 31-20-15 134.4 95 73.215
 LIC SBG COMMUNICATIONS OF BLH-901116KD 506 97-18-37 285.8 +39.4 CLEAR

JF&A
 COMMUNICATIONS
 CONSULTANTS

ALLOCATION STUDY

KMVL
 MADISONVILLE, TX
 EXHIBIT A

KMVL**1220 AM****MARCH 16, 1995**

I HAVE READ THE ATTACHED COMMENTS AND COUNTER PROPOSAL AND STATE
UNDER PENALTY OF PERJURY THAT THE FACTS CONTAINED THEREIN ARE TRUE
AND CORRECT TO THE BEST OF MY INFORMATION AND BELIEF.

Leon Hunt

LEON HUNT